

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

MICHAEL KULAKOWSKI, )  
 )  
Plaintiff, )  
 )  
vs. ) CASE NO.  
 ) 3:16-CV-02510  
 )  
WESTROCK SERVICES, INC., )  
 )  
Defendant. )

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DEPOSITION OF  
JAMES KEITH HALL  
Taken on Behalf of the Plaintiff  
November 15, 2017  
Commencing at 9:35 a.m.

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Reported by: Jerri L. Porter, RPR, CRR  
Tennessee LCR No. 335  
Expires: 6/30/2018

Brentwood Court Reporting Services  
(615) 791-6983 \* \* \* (888) 991-DEPO

1 Q Did you see Mr. Whited physically touch any  
2 other male employees?

3 A I can't -- I can't recall any, but it's been  
4 a long time, too.

5 Q Did any employees come to you and talk to  
6 you about it?

7 A No.

8 Q Do you recall Mr. Kulakowski coming and  
9 telling you about Tommy doing things to him?

10 A Kuli?

11 Q Yes.

12 A No.

13 Q No, you don't recall, or no, it didn't  
14 happen?

15 A No, I don't recall.

16 Q Now, did any employees come to you and  
17 complain about anything like that about Mr. Whited's  
18 behaviors?

19 A No.

20 Q Did you ever hear Mr. Whited tell a male  
21 employee to give him any kind of oral sex or hear  
22 about him showing them his private parts?

23 A No.

24 Q Or anything like that? I'm kind of sort of  
25 making the statements a little bit gentle, but did

1 MS. DOHNER SMITH: Just a couple of  
2 things.

3 E X A M I N A T I O N

4 BY MS. DOHNER SMITH:

5 Q A while back you were asked about the  
6 interim general manager, Eric Underwood.

7 A Yes.

8 Q Is he the general manager at Humboldt, at  
9 that facility?

10 A Eric is actually the regional sales manager.

11 Q Okay. So, when he was acting as the interim  
12 general manager, was he doing his own duties and  
13 filling in?

14 A Yes.

15 Q Okay. The presentation of results regarding  
16 the survey that HR puts together, does that include  
17 the names of any individuals reporting on the  
18 survey?

19 A No.

20 Q You said that at the fulfillment center  
21 there were around 65 employees with temps and all.  
22 How many actual WestRock employees are at the  
23 fulfillment center?

24 A Currently, around 25.

25 Q Okay. Do you know how many it was in like

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1 2006?

2 A Twelve.

3 MS. COLLINS: 2006?

4 BY MS. DOHNER SMITH:

5 Q I'm sorry. 2016.

6 A That's what I took it as, '16.

7 Q So there were about 12 WestRock employees in  
8 2016?

9 A That's close.

10 Q What about WestRock employees at the sheet  
11 plant? How many now and how many in 2016?

12 A Close to 30.

13 Q Okay. Now, temp agency, they have somebody  
14 on site that handles issues with their -- with the  
15 temporary employees, right?

16 A Yes.

17 Q And that was the case in 2016 as well?

18 A Yes.


19 Q Earlier you were asked about seeing people  
20 slap people in the groin and you kind of made a hand  
21 gesture. Could you explain what you mean by Tommy  
22 hit you in the groin or what you saw him do with  
23 others? Because it's hard to get down -- you can't  
24 get down on the record physical movement in the  
25 room. Can you try to voice --

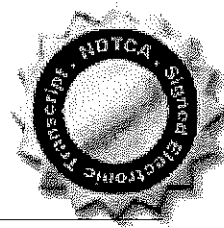
## REPORTER'S CERTIFICATE

I, Jerri L. Porter, RPR, CRR, Notary Public and Court Reporter, do hereby certify that I recorded to the best of my skill and ability by machine shorthand all the proceedings in the foregoing transcript, and that said transcript is a true, accurate, and complete transcript to the best of my ability.

I further certify that I am not an attorney or counsel of any of the parties, nor a relative or employee of any attorney or counsel connected with the action, nor financially interested in the action.

SIGNED this 26th day of November, 2017.

  
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Jerri L. Porter, RPR, CRR



My Notary commission expires: 2/19/2018

Tennessee LCR No. 335  
Expires: 6/30/2018